

Having our station be required to maintain 18 or 24 hour airchecks would be a costly burden on our station. We are an independent, non commercial stations and the cost of the equipment to do all day airchecks could be used for other things at the station. Equipment in an analog format would require us to use and store audio tape; digital recording would require us to purchase a computer and store digital media. In every other aspect of American law the burden of proof to provide evidence of wrongdoing is on the accuser. The proposed policy change would place that burden of proof on broadcasters to maintain costly audio records